## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Paul James Stowe Case No. 25-00968-KMS
Leslie Goins Stowe, Debtors CHAPTER 13

## APPLICATION TO EMPLOY SPECIAL COUNSEL

COMES NOW, Debtors ("Applicants"), by and through undersigned counsel, and pursuant to 11 U.S.C. §329, files this Application to Employ Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

- 1. That Debtors represent that in the administration of the above referenced Debtors' estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtors' personal injury claim.
- 2. That the Debtors desire to employ Will Parker of Will Parker Law Firm to render services in connection with the claim as Special Counsel for the Debtors.
- 3. That it would be in the best interest of the estate that said firm be employed.
- 4. The attorney of Will Parker Law Firm has attached his affidavit hereto, stating that the attorney is a disinterested party to Debtors' estate. See Exhibit "A".
- 5. That in consideration of said representation, Special Counsel will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Will Parker of Will Parker Law Firm as Special Counsel for the Debtors under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Paul James Stowe, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
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## **CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on June 3, 2025, to:

By USPS First Class Mail:

Paul and Leslie Stowe 2095A Hwy 11 and 80 Meridian, MS 39301

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.